

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

AT&T SERVICES, INC., AT&T MOBILITY,
LLC, and AT&T CORP.,

Defendants.

Case No. 2:23-cv-00397-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF REZA MIRZAIIE IN SUPPORT OF PLAINTIFF HEADWATER
RESEARCH LLC'S MOTIONS *IN LIMINE***

1. I, Reza Mirzaie, declare as follows:

2. I am counsel for Headwater Research, LLC (“Headwater”) in the above-captioned matter. I provide this declaration in support of Headwater’s Motions *in Limine* (“MILs”). I have personal knowledge of the facts set forth herein, and if called upon to testify, I could and would testify competently thereto.

3. Attached as Exhibit 1 is a true and correct copy of the Order on Motions *in Limine* in *Headwater v. Samsung*, 2:22-cv-00422-JRG-RSP, Dkt. No. 350 (E.D. Tex, July 8, 2024).

4. Attached as Exhibit 2 is a true and correct copy of the Memorandum Order in *Headwater v. Samsung*, 2:22-cv-00422-JRG-RSP, Dkt. No. 435 (E.D. Tex, November 8, 2024).

5. Attached as Exhibit 3 is a true and correct copy of the Order on Motions *in Limine* in *Headwater v. Samsung*, 2:23-cv-00103-JRG-RSP, Dkt. No. 360 (E.D. Tex, March 28, 2025).

6. Attached as Exhibit 4 is a true and correct copy of the Non-Binding Letter of Intent, dated February 10, 2020 (produced at HW_00067573, HW352-00098476, HW379-00044297, HW397-00044297).

7. Attached as Exhibit 5 is a true and correct copy of the Order Denying Samsung’s Opposed Motion for Leave to Serve a Supplemental Rebuttal Report in *Headwater v. Samsung*, 2:22-cv-00422-JRG-RSP, Dkt. No. 482 (E.D. Tex, January 6, 2025).

8. Attached as Exhibit 6 is a true and correct copy of excerpts from the Deposition Transcript of Dr. Gregory Raleigh in *Headwater v. Samsung*, 2:22-cv-00422-JRG-RSP, dated March 8, 2025.

9. Attached as Exhibit 7 is a true and correct copy of excerpts from the Trial Transcript (Day 1) in *Headwater v. Samsung*, 2:23-CV-00103-JRG, dated April 21, 2025.

10. Attached as Exhibit 8 is a true and correct copy of excerpts from the Trial Transcript

(Day 3) in *Headwater v. Samsung*, 2:23-CV-00103-JRG, dated April 23, 2025.

11. Attached as Exhibit 9 is a true and correct copy of excerpts from the Trial Transcript (Day 5) in *Headwater v. Samsung*, 2:23-CV-00103-JRG, dated April 25, 2025.

12. Attached as Exhibit 10 is a true and correct copy of excerpts from the Trial Transcript (Day 2) in *Headwater v. Samsung*, 2:23-CV-00103-JRG, dated April 22, 2025.

13. Attached as Exhibit 11 is a true and correct copy of excerpts from the Deposition Transcript of Jennifer Smith, dated January 31, 2025.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 16, 2025 in Los Angeles, California.

/s/ Reza Mirzaie
Reza Mirzaie